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December 10, 2019

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Via ECF

The Honorable Michael E. Wiles United States Bankruptcy Court Southern District of New York One Bowling Green New York, NY 10004-1408

Re: Blue Dog at 399 Inc. v. Seyfarth Shaw, LLP and Ralph Berman (Adv. Proc. No. 19-

01029 (MEW))

Dear Judge Wiles:

We represent Defendants and Third-Party Plaintiffs Seyfarth Shaw, LLP and Ralph Berman (collectively, "Seyfarth") in the above-captioned adversary proceeding. On December 5, 2019, we submitted a letter (the "Letter") requesting a conference with the Court concerning two discovery disputes between Seyfarth and Plaintiff Blue Dog at 399 Inc. ("Blue Dog"). Pursuant to a December 10, 2019 email from Ronald Howard, your law clerk, requesting that Seyfarth file copies of the discovery requests to Blue Dog, we have attached as Exhibit 1 to this letter (1) Seyfarth's first requests for production (previously provided as Exhibit B-1 to the Letter), (2) Seyfarth's first requests for admission, and (3) Seyfarth's first set of interrogatories. For the Court's convenience and in case it may be helpful, we have also included Blue Dog's responses and objections to the foregoing.

Sincerely,

Joel C. Haims

cc: All Counsel in the Case (via ECF)